

To: Skadowski, Suzanne[Skadowski.Suzanne@epa.gov]
From: Dermer, Michele
Sent: Wed 3/4/2015 8:57:01 PM
Subject: Re: UICs desk statement

thanks Suzanne.

From: Skadowski, Suzanne
Sent: Wednesday, March 4, 2015 12:51 PM
To: Rao, Kate
Cc: Albright, David; Dermer, Michele; Mogharabi, Nahal; Maier, Brent; Montgomery, Michael; Zito, Kelly; Keener, Bill
Subject: UICs desk statement

Final desk statement/response provided to SF Chronicle today:

We received a copy of the State's Class II Underground Injection Control (UIC) Program Revision Plan on February 6, 2015. We are reviewing and discussing the plan with the State and will ensure that the plan contains actions that will bring California's oil and gas UIC program back into compliance with the Safe Drinking Water Act.

We also received the State's March 2, 2015 memo: Cal EPA Review of UIC Program. As we previously stated, EPA identified concerns about Class II injection wells located outside of approved aquifer exemption boundaries and we communicated this to the State by email in May 2012. A subsequent series of internal EPA file reviews and discussions with the State revealed that our collective records were unclear with regard to the status of 11 aquifer formations the State requested to exempt at the time that they applied for oil and gas UIC primacy.

We will continue our heightened oversight of the State to ensure that the oil and gas UIC program meets federal requirements. This effort includes ensuring that several hundred disposal wells, including approximately 70 disposal wells in the 11 aquifer formations historically treated as exempt, and nearly two thousand enhanced oil recovery wells permitted to inject into non-exempt aquifers, are addressed as expeditiously as possible, with an immediate emphasis on the wells in aquifers with the highest water quality.

Suzanne Skadowski

Public Affairs Specialist

U.S. Environmental Protection Agency | San Francisco

D: 415-972-3165| **C:** 415-265-2863| **E:** skadowski.suzanne@epa.gov

From: Diamond, Jane

Sent: Wednesday, March 04, 2015 10:00 AM

To: Skadowski, Suzanne; Montgomery, Michael; Quast, Sylvia; Engelman, Alexa; Moffatt, Brett

Cc: Albright, David; Dermer, Michele; Rao, Kate; Mogharabi, Nahal; Maier, Brent

Subject: RE: Draft Final Desk Statement - deliberative/confidential

Looks fine to me. Thanks.

Jane Diamond

Water Director, EPA Region 9

415-947-8707

From: Skadowski, Suzanne

Sent: Wednesday, March 04, 2015 9:29 AM

To: Montgomery, Michael; Quast, Sylvia; Engelman, Alexa; Moffatt, Brett; Diamond, Jane

Cc: Albright, David; Dermer, Michele; Rao, Kate; Mogharabi, Nahal; Maier, Brent

Subject: RE: Draft Final Desk Statement - deliberative/confidential

Please give this a final read-through before I send to the SF Chronicle this morning - thanks:

DRAFT/DELIBERATIVE/CONFIDENTIAL

We received a copy of the State's Class II Underground Injection Control (UIC) Program Revision Plan on February 6, 2015. We are reviewing and discussing the plan with the State and will assure that the plan contains actions that will bring California's oil and gas UIC program back into compliance with the Safe Drinking Water Act. We also received

the State's March 2, 2015 memo: Cal EPA Review of UIC Program. As we previously stated, EPA identified concerns about Class II injection wells located outside of approved aquifer exemption boundaries and we communicated this to the State by email in May 2012. A subsequent series of internal EPA file reviews and discussions with the State revealed that our collective records were unclear with regard to the status of 11 aquifer formations the State requested to exempt at the time that they applied for oil and gas UIC primacy. We will continue our heightened oversight of the State to ensure that the oil and gas UIC program meets federal requirements. This effort includes ensuring that several hundred disposal wells, including approximately 70 disposal wells in the 11 aquifer formations historically treated as exempt, and nearly two thousand enhanced oil recovery wells permitted to inject into non-exempt aquifers, are addressed as expeditiously as possible, with an immediate emphasis on the wells in aquifers with the highest water quality.

Suzanne Skadowski

Public Affairs Specialist

U.S. Environmental Protection Agency | San Francisco

D: 415-972-3165| C: 415-265-2863| E: skadowski.suzanne@epa.gov

From: Montgomery, Michael

Sent: Tuesday, March 03, 2015 3:54 PM

To: Quast, Sylvia; Engelman, Alexa; Moffatt, Brett; Diamond, Jane

Cc: Skadowski, Suzanne; Albright, David; Dermer, Michele; Rao, Kate; Mogharabi, Nahal; Maier, Brent

Subject: Draft Final Desk Statement - deliberative/confidential

We need to finalize this and put it into play tomorrow a.m.. We have a pending inquiry. Comments to Suzanne please

DRAFT/DELIBERATIVE/CONFIDENTIAL

We received a copy of the State's Class II Underground Injection Control Program Revision Plan on February 6, 2014. We have been reviewing and discussing the plan with the State and will assure that the plan contains actions that will bring their UIC program back into compliance with the SDWA. We also received the State's March 2, 2015 memo: Cal EPA Review of UIC Program. As we previously stated, EPA identified concerns in May 2012 about Class II injection wells outside of approved aquifer exemption boundaries. We communicated this to the DOGGR by email in May 2012. A subsequent series of internal EPA file reviews and discussions with the State revealed that our collective records were unclear

with regard to the status of 11 of the formations the State requested to exempt at the time that they applied for primacy. We will continue to oversee the State to ensure that their Class II UIC program meets federal requirements. This effort includes ensuring that the several hundred disposal wells, including the approximately 70 disposal wells in the 11 formations, and the nearly two thousand enhanced recovery wells permitted to inject into non-exempt aquifers are addressed as expeditiously as possible.

Michael Montgomery

Assistant Director - Water Division

US EPA Region 9

415-972-3438